

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Campbell</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensley</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

---

**MOTION FOR LEAVE TO FILE UNDER SEAL**

---

Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Agreed Protective Order previously entered in this action (ECF Doc. No. 52), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal his Memorandum in Support of Response to Motion for Leave to File Under Seal (the “Sealing Memorandum”) and his Consolidated Memorandum in Support of Plaintiff’s Reply in Support of Motion to Compel and Plaintiff’s Response in Opposition to Guidepost Solutions LLC’s Motion for Protective Order and *In Camera* Review (the “Consolidated Memorandum”), pending adjudication of the Motion for Leave to File Under Seal filed by Guidepost (ECF Doc. No. 64). The Sealing Memorandum and the Consolidated Memorandum reference certain redacted portions of the Memorandum of Law in Support of Motion by Defendant Guidepost Solutions LLC for a Protective Order and *In Camera* Review (ECF Doc. No. 63) and the Declaration of Steven G. Mintz (ECF Doc. No. 65), both of which Guidepost is attempting to seal.

Plaintiff categorically and unequivocally opposes the attempt by Guidepost to seal the redacted portions of its Memorandum of Law in Support of Motion by Defendant Guidepost Solutions LLC for a Protective Order and *In Camera* Review (ECF Doc. No. 63) and the Declaration of Steven G. Mintz (ECF Doc. No. 65). For the reasons set out in his opposition to Guidepost's Motion for Leave to File Under Seal, the Court should deny Guidepost's attempts to hide its damaging admissions from the public. None of the information Guidepost seeks to maintain under seal is confidential, and Guidepost has failed to carry the very heavy burden of justifying sealing the referenced documents.

While Plaintiff disagrees that any of the information sought to be sealed by Guidepost should be sealed, Plaintiff files the instant motion in an effort to ensure compliance with the Local Rules of the Court and the Agreed Protective Order previously entered in this action (ECF Doc. No. 52), until such time as the Court adjudicates the Motion for Leave to File Under Seal filed by Guidepost (ECF Doc. No. 64).

For the foregoing reasons, as well as the reasons set forth in the accompanying Sealing Memorandum and the Consolidated Memorandum, this Court should deny the Motion for Leave to File Under Seal (ECF Doc. No. 64) and the Motion for a Protective Order and *In Camera* Review (ECF Doc. No. 61) filed by Guidepost.

Dated: October 27, 2023

Respectfully submitted,

s/ Andrew Goldstein

---

**Todd G. Cole, Esq., BPR # 031078**

**Andrew Goldstein, Esq., BPR # 037042**

COLE LAW GROUP, P.C.

1648 Westgate Circle, Suite 301

Brentwood, TN 37027

Telephone: (615) 490-6020

Fax: (615) 942-5914

tcole@colelawgroupc.com

agoldstein@colelawgroupc.com

*-and-*

**Robert D. MacGill, Esq. (*pro hac vice*)**

**Scott E. Murray, Esq. (*pro hac vice*)**

**Patrick J. Sanders, Esq. (*pro hac vice*)**

MACGILL PC

156 E. Market St.

Suite 1200

Indianapolis, IN 46204

Telephone: (317) 721-1253

robert.macgill@macgilllaw.com

scott.murray@macgilllaw.com

patrick.sanders@macgilllaw.com

*Attorneys for Plaintiff*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Leave to File Under Seal has been served on October 27, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

E. Todd Presnell, Esq.  
Scarlett Singleton Nokes, Esq.  
R. Brandon Bundren, Esq.  
BRADLEY ARANT BOULT CUMMINGS LLP  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203  
snokes@bradley.com  
bbundren@bradley.com

Gene R. Besen, Esq.  
BRADLEY ARANT BOULT CUMMINGS LLP  
Fountain Place  
1445 Ross Avenue, Suite 3600  
Dallas, Texas 75202

Thomas J. Hurney, Jr., Esq.  
Gretchen M. Callas, Esq.  
JACKSON KELLY PLLC  
500 Lee Street East, Suite 1600  
Post Office Box 553  
Charleston, West Virginia 25322  
Telephone: 304-340-1000  
thurney@jacksonkelly.com  
gcallas@jacksonkelly.com

*Counsel for the Executive Committee of the  
Southern Baptist Convention*

John R. Jacobson, Esq.  
Katharine R. Klein, Esq.  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, Tennessee 37203  
jjacobson@rjfirm.com  
kklein@rjfirm.com

Steven G. Mintz, Esq.  
Terence W. McCormick, Esq.  
MINTZ & GOLD LLP  
600 Third Avenue, 25<sup>th</sup> Fl.  
New York, New York 10016  
mintz@mintzandgold.com  
mccormick@mintzandgold.com

*Counsel for Guidepost Solutions LLC*

L. Gino Marchetti, Jr., Esq.  
Matthew C. Pietsch, Esq.  
TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC  
2908 Poston Avenue  
Nashville, Tennessee 37203  
gmarchetti@tpmblaw.com

*Counsel for the Southern Baptist Convention*

s/ Andrew Goldstein  
\_\_\_\_\_  
ANDREW GOLDSTEIN